

EXHIBIT 11

From: [Droze, William M.](#)
To: [Gary Davis](#)
Cc: [Stacy Snow](#); [Jeff Friedman](#); [Andy Davis](#); [Lee Patterson](#); [West, Kadeisha A.](#); [Bailey, Matt](#)
Subject: RE: Parris v. Mount Vernon Mills, et al.
Date: Thursday, November 10, 2022 11:44:12 AM
Attachments: [image001.png](#)

Gary: I am available today from 2-3:30p EST for a further discussion. As I have explained, it is precisely the communications pre-dating the relevant period that are the problem; but if you have suggestions as to limiting search terms or custodians we are happy to determine what, if any, reduction in the burden might be accomplished.

In the interim, has Summerville made a document production in this case? If I have overlooked it, I apologize. Best, W

William M. Droze

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From: Gary Davis <gadavis@enviroattorney.com>
Sent: Wednesday, November 9, 2022 5:22 PM
To: Droze, William M. <william.droze@troutman.com>
Cc: Stacy Snow <ssnow@enviroattorney.com>; Jeff Friedman <jfriedman@friedman-lawyers.com>; Andy Davis <adavis@brinson-askew.com>; Lee Patterson <lpatterson@friedman-lawyers.com>; West, Kadeisha A. <Kadeisha.West@troutman.com>; Bailey, Matt <matt.bailey@troutman.com>
Subject: RE: Parris v. Mount Vernon Mills, et al.

EXTERNAL SENDER

William,

Thanks for this. We may be able to agree on the timeframe. Our issue is still that this leaves out communications, such as emails, between the chemical suppliers and MVM concerning the chemicals that are not MSDSs/SDSs. We would like to discuss this with you further. Perhaps we can agree on search terms and custodians. Jeff Friedman and I are available most of the day tomorrow.

Best,

Gary